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URAL B. ADAMS, JR (1947-80)

March 4, 2016

Mr. Samuel Stringfellow, Esq.
Assistant U.S. Attorney
Federal Building
167 North Main Street
Ste 800
Memphis, TN 38103

RE: UNITED STATES V. ARTHUR ALFORD
Case No: 2:16-CR-

Dear Mr. Stringfellow:

I hope this letter finds you well. As you may know, I will be representing Mr. Arthur Alford under the above-indicted case. Pursuant to F.R.Cr.P16 as well as LCrR 15.1, please consider this letter as Mr. Alford's formal request for all written discovery, including, but not limited to demonstrative evidence, video, audio, and any other tangible or written objects to which Mr. Alford is entitled to under the Federal Rules of Criminal Procedure. This request is calculated to include both inculpatory as well as exculpatory evidence. I am also requesting copies of any and all statements which Mr. Alford is alleged to have made regarding the indicted offense. Please note that all requests herein are to be construed as continuing in nature, pursuant to F.R.Cr.P 16(c).

Please be advised that unless we hear from the Government to the contrary we will assume that your office is not withholding any discovery which it intends to offer at trial against Mr. Alford. Our request is also calculated to include all criminal records of the defendant that the Government intends to introduce or rely on at the trial in this matter, as well as any and all criminal records of material witnesses whom the government intends to call as witnesses at the trial in this matter. Pursuant to Rule of Criminal Procedure 16(c), please know that there is a continuing request for the prompt production and identity for any and all agreements entered into between the Government and any witness(es) called to testify against the defendant at trial in this matter.

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If there are tangible discoverable objects (i.e., narcotics, handgun, audio or video footage, etc.) in the government's possession or that the government intends to use in the trial of this matter, or which otherwise qualify as discoverable material, please contact me to arrange a mutually convenient time for me to review and inspect the same. If any evidence has been lost, destroyed, or otherwise altered, please notify me promptly of the same. If there are search warrants or arrest warrants regarding the facts alleged in defendant's indictment, we request copies of the same and an opportunity as well, to inspect the originals of said documents. In addition, please produce, or make available for inspection, copying or photograph, any and all results or reports of any tests performed with respect to the matters alleged in this indictment.

Defendant further requests that the Government provide a summary of any and all experts expected to be used by the Government in its case in chief, including all matters which are required to be disclosed pursuant to Rule 16(a)(1)(G).

Finally, please contact our office when this discovery is ready so we can make arrangements to obtain the same. Thank you for your attention in this regard. Should you have any questions regarding our requests, please do not hesitate to contact me.

With best regards, I remain

Sincerely,

THE WHARTON LAW FIRM

s/André C. Wharton

ANDRÉ C. WHARTON

ACW/lb
Cc: Mr. Arthur Alford